

*Daniel J. Rylander, P.C.*  
*Attorney At Law*  
*2701 E. Speedway Blvd., Suite 203*  
*Tucson, Arizona 85716*  
*Office (520) 299-4922 - Fax (520) 299-1482*

Daniel J. Rylander  
PAN #64969 - Ariz. Bar #15279  
Attorney for Debtors

**IN THE UNITED STATES BANKRUPTCY COURT**

**FOR THE DISTRICT OF ARIZONA**

In re:

FRANK SHANE FOLSOM AND DIANA A.  
FOLSOM,  
Debtors.

In re:

DESERT FUN FOODS, LLC,  
Debtor.

WILMINGTON SAVINGS FUND SOCIETY,  
FSB, d/b/a Christiana Trust, as  
indenture trustee, for the CSMC  
2017-1 Trust, Mortgage-Backed  
Notes, Series 2017-1, its  
assignees and/or successors, by  
and through its servicing agent  
Select Portfolio Servicing,  
Inc.,

Movant,

v.

FRANK SHANE FOLSOM AND DIANA A.  
FOLSOM,

Respondents.

Chapter 11 Jointly  
Administered Cases

No. 4:15-bk-05692-BMW

No. 4:16-bk-14236-BMW

**OBJECTION TO MOTION FOR RELIEF  
FROM AUTOMATIC STAY**

1 The Debtors Folsom, through their attorney, undersigned,  
2 hereby object to the Motion for Relief from The Automatic Stay  
3 (the "Motion"), and in support of such objection, states as  
4 follows:  
5

6 1. The subject property is necessary to the Debtors'  
7 effective reorganization, as the subject property is the  
8 Debtors' residence. The property that is subject to Movant's  
9 interest is worth \$125,000, as listed by the Debtors on Schedule  
10 A of their Schedules.  
11

12 2. Movant claims it is owed \$56,378.18 total outstanding  
13 debt. The equity in the subject property provides Movant with  
14 adequate protection for their interest in the subject property.  
15

16 3. Movant claims there is no equity but provides no basis  
17 for such assertion.

18 4. The Debtors have been in touch with and agreed with  
19 Movant's counsel's request for a cure to the alleged delinquency  
20 but such agreement is not yet documented.  
21

22 WHEREFORE, it is respectfully requested that Movants'  
23 motion be denied, and for such other and further relief as the  
24 Court deems just.

25 Dated January 4, 2018

26 /s/ Daniel J. Rylander  
27 DANIEL J. RYLANDER  
28 DANIEL J. RYLANDER, P.C.  
Attorney for Debtor

1  
2 Copy of the foregoing mailed/  
3 served January 4, 2018  
4 to/on the following:

5 Lakshmi Jagannath, Esq.  
6 McCARTHY & HOLTHUS, LLP  
7 8502 E. Via de Ventura, Suite 200  
8 Scottsdale, AZ 85258  
9 bknotice@mccarthyholthus.com  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28